

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 1997  
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)  
) Docket No. R97-1  
)

SECOND SET OF INTERROGATORIES  
OF MAJOR MAILERS ASSOCIATION  
TO UNITED STATES POSTAL SERVICE WITNESS  
PETER HUME (USPS-T-18)

Major Mailers Association asks the United States Postal Service to answer the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. In answering these interrogatories, the witness is requested to follow the General Instructions that were set forth in the Attachment to the First Set of Interrogatories to this witness. Requests for data or documents are to be interpreted in accordance with General Instructions G and H. If the designated witness is unable to respond to any interrogatory, the Postal Service is asked to redirect the question to another Postal Service witness who can answer it.

Respectfully submitted,

MAJOR MAILERS ASSOCIATION



Richard Littell  
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August 28, 1997

**MMA INTERROGATORIES TO USPS WITNESS  
(Peter Hume: Set Two)**

**MMA/USPS-T-18-2.**

Please refer to USPS-29C, p. 1.

(A) Please confirm that the unit delivery costs for all of the categories of First-Class letters shown there were derived under the USPS proposed cost methodology that assumes that labor costs are not 100% variable with volume. If you cannot confirm, please explain.

(B) Please provide the unit delivery costs for all of the categories of First-Class letters shown there under the current accepted cost methodology whereby labor costs are assumed to be 100 % variable with volume.

**End of Set Two Interrogatories,  
but please note  
General Instructions For Answering)**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document, by First-Class Mail, upon the participants in this proceeding.

August 28, 1997

  
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Richard Littell